

**EXHIBIT A**

**Jayne L. Freeman**

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**From:** Derek C. Chen  
**Sent:** Wednesday, February 28, 2018 12:27 PM  
**To:** joe@joethomas.org; Jayne L. Freeman  
**Cc:** LaHoma Walker  
**Subject:** RE: University of Washington's Discovery Assistance

Joe,

As I stated in my last email, our correspondence with you has been respectful, and we ask the same from you.

For your convenience, we are putting together a thumb drive with all pleadings filed in this case and all discovery. We will mail it to you when it's done. This is to make sure you have everything you need, although your client should have given it to you already. It doesn't sound like she has. If the Court allows you to amend your Complaint to add 1983 claims, we can discuss additional formal written discovery (as you have suggested) that defines terms such as "were responsible for" and "involved in" so we can make sure we are identifying the correct people. Also, you can see our initial disclosures for general answers to your questions.

Let's take this one step at a time since the parties seem to be getting some wires crossed and it's leading to some confusion. We will await your motion to amend your complaint. Thanks, Joe!

Derek

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**From:** joe@joethomas.org [mailto:joe@joethomas.org]  
**Sent:** Wednesday, February 28, 2018 11:48 AM  
**To:** Jayne L. Freeman <JFreeman@kbmlawyers.com>  
**Cc:** Derek C. Chen <DChen@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>  
**Subject:** University of Washington's Discovery Assistance

Dear Jayne:

As I have mentioned in previous emails there are things that the University of Washington could do to help move this case forward more expeditiously. I am not sure if there is some misunderstanding about what Ms. Dalessio is asking for from the University of Washington, so I am writing to clarify the situation. This will help all parties move forward as quickly as possible with this lawsuit.

First, Ms. Dalessio would like to know the identity of the parties and their involvement, so these individuals can be joined in the lawsuit by your March 12, 2018 proposed deadline. I previously emailed you on February 27, 2018 at 10:41 AM and asked three questions: 1. Which individuals were responsible for removing the documents identified in paragraph 2 in the 2003 Settlement Agreement [Dkt. 30-3]; 2. Which individuals were directly involved in producing the documents under the Public Records Act to Mr. Betz in December 2015 that is at issue in this lawsuit (the search and the production of records); 3. Which individuals in your law firm were involved in uploading the documents to PACER that ultimately were sealed by this Court [dkt. 51]. My Feb. 27 email to you is attached to this email for your convenience. When you responded to my email, the same day, on February 27, 2018 at 12:20 PM you were evasive at best. For the first question, you failed to respond to the first question completely because you stated it is not relevant. For the second question, you failed to even mention anything about the second question by providing a response at all. For the third question, you gave me a legal argument and then directed me to some unknown papers, which you did not even have the courtesy to attach to the email. For your convenience, your Feb. 27 email responding to my questions is attached to this document. I wrote you another email later that day, at 1:52 PM, to clarify your response by attaching the documents you enumerated, so I could review them. My response to you at 1:52 PM is attached to this email for your convenience. You responded, on the same day, Feb. 27 at 2:37 PM; but you completely failed to address my request for the documents that you enumerated.

Are you going to help move this litigation along and provide the information that I requested on February 27 at 10:41 AM?

Thank you for your anticipated cooperation in helping me move this case forward expeditiously.

Very truly yours,

Joe

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